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7 United States of America

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9 IN THE UNITED STATES DISTRICT COURT

10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MARIO GONZALEZ,

15 Defendant.

16 CASE NO. 2:20-CR-00013 WBS

17 STIPULATION AND ORDER TO CONTINUE
18 JUDGMENT AND SENTENCING HEARING AND
19 MODIFY PRESENTENCE SCHEDULE

20 DATE: June 26, 2023

21 TIME: 9:00 a.m.

22 COURT: Hon. William B. Shubb

23

24 STIPULATION

25 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
26 through defendant's counsel of record, hereby stipulate as follows:

27 1. By previous order, this matter was set for judgment and sentencing on June 26, 2023.

28 2. By this stipulation, the parties now move to continue the judgment and sentencing

hearing until November 13, 2023. The parties understand that this date is available to the Court for a
continued judgment and sentencing hearing.

3. The assigned probation officer is working to complete the presentence investigation
process, and an extended timeline for the presentence report is necessary. Moreover, this matter is likely
going to be assigned to a new probation officer in the near term, and the new probation officer will need
time to familiarize himself/herself with this case. Finally, the parties desire additional time to conduct
investigation of matters that may be relevant to sentencing.

4. It is therefore requested that the PSR and judgment and sentencing schedule be modified as follows:

a)	Proposed Presentence Report Due:	October 2, 2023
b)	Written Objections to Presentence Report Due:	October 16, 2023
c)	Presentence Report Due:	October 23, 2023
d)	Motion for Correction of Presentence Report Due:	October 30, 2023
e)	Reply or Statement Due:	November 6, 2023
f)	Judgment and Sentencing:	November 13, 2023, 9:00 a.m.

IT IS SO STIPULATED.

Dated: June 21, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ AARON D. PENNEKAMP

AARON D. PENNEKAMP
EMILY G. SAUVAGEAU
Assistant United States Attorneys

Dated: June 21, 2023

/s/ TAMARA SOLOMAN
TAMARA SOLOMAN
TASHA CHALFANT
Counsel for Defendant
MARIO GONZALEZ

ORDER

IT IS SO FOUND AND ORDERED.

Dated: June 21, 2023

William B. Shubb
WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE